

1 E. MARTIN ESTRADA
United States Attorney
2 SCOTT M. GARRINGER
Assistant United States Attorney
3 Chief, Criminal Division
HAOXIAOHAN CAI (Cal. Bar No. 331131)
4 Assistant United States Attorneys
General Crimes Section
5 1200 United States Courthouse
312 North Spring Street
6 Los Angeles, California 90012
Telephone: (213) 894-0762
7 Facsimile: (213) 894-0141
E-mail: Haoxiaohan.cai@usdoj.gov

8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 CYNTHIA ANN HERNANDEZ,
aka "Cynthia Roberts,"

16 Defendant.
17

No. CR 22-00217-MCS

JOINT DISCOVERY STATEMENT

Trial Date: November 11, 2022
Trial Time: 8:30 a.m.
Location: Courtroom of the
Hon. Mark C. Scarsi

18 Plaintiff United States of America, by and through its counsel
19 of record, the United States Attorney for the Central District of
20 California and Assistant United States Attorney Haoxiaohan Cai, and
21 defendant Cynthia Ann Hernandez ("defendant"), by and through her
22 counsel of record, Ralph R. Rios, hereby submit a joint discovery
23 statement in the above-captioned case, pursuant to the Initial
24 Standing Order for Criminal Cases Assigned to the Honorable Judge
25 Mark C. Scarsi.
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1 **I. DISCOVERY STATUS**

2 **A. Past Discovery Production**

3 On September 20, 2022, the government produced non-confidential
4 discovery to the defense, including defendant's criminal history
5 documents; law enforcement reports; search warrant materials and
6 related photographs; loss spreadsheets and calculations; vehicle
7 registration information; and other records pertaining to the
8 evidence in the case.

9 **B. Anticipated Discovery Productions**

10 On September 27, 2022, the parties filed a proposed protective
11 order with the court governing production of (1) Personal Identifying
12 Information and (2) material that may contain information within the
13 scope of the Privacy Act. On September 28, 2022, the court entered
14 the order. The government is working diligently to redact and
15 produce the remaining discovery, which includes voluminous jail calls
16 between defendant and inmates as alleged in the indictment, as well
17 as numerous documents bearing third-parties' PII, now that the
18 protective order is in place.

19 If this matter proceeds to trial, and to the extent additional
20 discoverable materials are obtained by the government, the government
21 will produce such materials to defendant in accordance with the
22 government's continuing discovery obligations, established law, and
23 the Court's order.

24 **II. DISPUTES AS TO DISCOVERY**

25 There are no disputes as to the discovery produced thus far.
26 The parties reserve the right to raise discovery issues with the
27 Court if they arise at a later date.

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1 **III. ANTICIPATED MOTIONS**

2 The parties do not anticipate filing any motions at this time
3 but reserve the right to file any motions to be heard at the motion
4 hearing date if the need arises.

5 **IV. TRIAL DATE**

6 At this time, defendant is still evaluating the discovery in
7 this case and will thereafter make a determination on whether she
8 will seek a continuance of the current trial date.

9 **V. LENGTH OF TRIAL**

10 The parties anticipate that the trial in this matter, voir dire
11 through closing arguments, will last approximately four to five days.

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13 DATED: September 29, 2022

E. MARTIN ESTRADA
United States Attorney

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15 SCOTT M. GARRINGER
Assistant United States Attorney
16 Chief, Criminal Division

17 /s/ Haoxiaohan Cai

18 HAOXIAOHAN CAI
Assistant United States Attorney

19
20 Attorneys for Plaintiff
UNITED STATES OF AMERICA

21
22 DATED: September 29, 2022

/s/ Ralph R. Rios (w/ permission)

23 RALPH R. RIOS
Attorney for Defendant
24 CYNTHIA ANN HERNANDEZ
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